

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY MULLEN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TERRAN ORBITAL, INC., MARC BELL,
GARY HOBART, JAMES LaCHANCE,
STRATTON SCLAVOS, MATTHEW EBY,
DANIEL STATON, PHILIP KRIM, CHRIS
HOLLOD, WISDOM LU, TOMMY
STADLEN, BORIS REVSIN, MICHAEL
KIM, TAILWIND TWO ACQUISITION
CORP., TAILWIND TWO SPONSOR LLC,
and CONTINENTAL STOCK TRANSFER
CORPORATION,

Defendants.

Case no. 1:23-cv-01394-JMF

~~PROPOSED~~ ORDER SETTING
SCHEDULE FOR AMENDED
COMPLAINT AND RESPONSE
THERE TO AND RESPONSIBILITIES
OF LEAD PLAINTIFFS AND LEAD
COUNSEL

JESSE M. FURMAN, United States District Judge:

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), on May 4, 2023 this court issued an Order (ECF No. 11) appointing “Lead Plaintiff Movants” as “Lead Plaintiffs” and their counsel as “Lead Counsel” which directed the parties by their respective counsel to confer and file a proposed Order setting forth the duties and responsibilities of Lead Plaintiff and Lead Counsel and deadlines for the filings of an amended complaint and response thereto;

WHEREAS, some or all Defendants or their counsel have corresponded with Lead Counsel acknowledging the lawsuit and complaint and received a copy of this proposed order for their consideration but have made no contribution to it by the time of its filing;

IT IS HEREBY ORDERED THAT:

1. Lead counsel, as counsel for lead plaintiffs, with primary responsibility are Lee Squitieri and Fletcher Moore, Squitieri & Fearon, LLP and Moore Kuehn, PLLC, respectively, as appointed by the Court, shall manage the prosecution of this litigation. Lead Counsel is to avoid duplicative or unproductive activities and is hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) to prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiff and the Class.

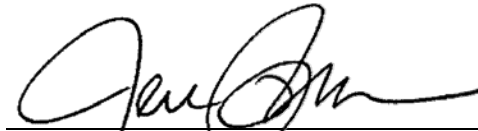
2. Lead Plaintiffs shall be provided with periodic status letters from counsel in addition to maintaining regular communications and consultations.

3. Lead Counsel shall file any amended complaint **no later than forty-five (45) days from the date of this Order.**

4. Defendants shall file an answer (or otherwise respond to the operative complaint) **no later than seventy-five (75) days from the date of this Order.**

SO ORDERED.

Dated: May 11, 2023
New York, New York



JESSE M. FURMAN
United States District Judge